



DENSO MANUFACTURING MICHIGAN, INC.

One Denso Road, Battle Creek, Michigan 49015-1083

Tel: (616) 965-3322, Fax: (616) 965-8399

September 26, 2000

Ms. Karen Henry
The Performance Track Information Center
c/o Industrial Economics Incorporated
2067 Massachusetts Avenue
Cambridge, MA 02140

Dear Ms. Henry:

Enclosed, please find DENSO Manufacturing Michigan, Inc's application for the National Environmental Achievement Track (NEAT). DENSO is an automotive parts manufacturer located in Battle Creek, Michigan. The facility is a Michigan designated Clean Corporate Citizen (C3) and ISO 14001 third-party certified.

Upon reviewing the requirements for the NEAT program, DENSO does have the following concerns with the application;

1. It is unclear what the specific benefits will be for the facility, as most of the benefit regulations are not proposed and not specifically described,
2. If the facility is not meeting, or does not meet, it's commitments to future improvements, it may lead to negative press due to the fact the information is required to be public. The commitments also cover numerous years, and production requirements may change during that time, resulting commitments to not be met,
3. Although DENSO is a larger facility, the public outreach activities may not be as numerous as other companies, and should not be deemed as inappropriate. The public outreach activities are relevant to the facility's positive image, small town location, and history of compliance. Implementing additional outreach activities can be misconstrued and result in negative and unwanted attention.
4. The annual report requires a summary of EMS/compliance audits and corrective actions taken. This report can bring negative attention to a facility that has a positive public image, compliance programs, and a goal to meet and exceed environmental requirements.
5. EPA has stated that they will visit the NEAT sites. EPA visits are viewed negatively, since an EPA visit is seen as a compliance audit.
6. The NEAT program does not consider that the facility is a part of a state recognition program, in this case C3, where the requirements are almost identical. A facility in a state and NEAT program will have to duplicate record-keeping and reporting efforts to maintain status in both programs. It seems that a facility in a state program should be automatically in the NEAT program, as the state typically knows and visits the facility more than the EPA.

September 26, 2000
Page 2

DENSO would like a response to the concerns listed above, including any draft guidance or regulations that may exist, by October 13, 2000. If many of the concerns are not resolved, DENSO may withdraw its NEAT application, as the concerns outweigh the benefits at this time. If you have any questions on DENSO Manufacturing Michigan's application or would like to discuss the concerns in more detail, please contact me at 616-965-3322, extension 3850.

Sincerely,

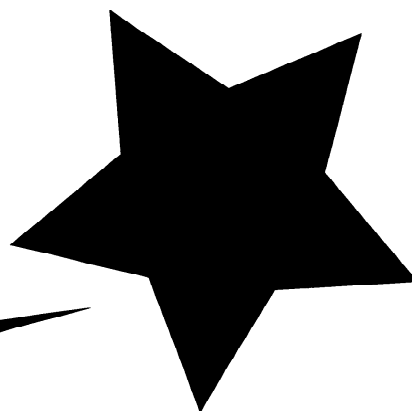
A handwritten signature in black ink that reads "Kathleen O'Shea". The signature is written in a cursive style with a horizontal line above the last name.

Kathleen O'Shea
Project Supervisor, Environmental/Chemical

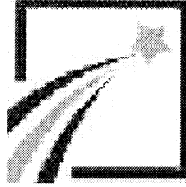
Enc.



National Environmental Achievement Track Application Form



AOS-0036



National Environmental Achievement Track

Application Form

DENSO Manufacturing Michigan, Inc
Name of facility

DENSO International America
Name of parent company (if any)

1 Denso Road
Street address

Street address (cont.)

Battle Creek, MI 49015
City/State/Zip code

Give us information about your contact person for the
National Environmental Achievement Track Program.

Name Kathleen O'Shei

Title Project Supervisor, Environmental

Phone 616-965-3322 x 3850

Fax 616-965-8399

E-mail Kathy-O'Shei@denso-diaa.com

Why do we need this information?

EPA needs background information on your facility to evaluate your application.

What do you need to do?

- Provide background information on your facility.
- Identify your environmental requirements.

Section A

Tell us about your facility.

1 What do you do or make at your facility?

Automotive heat exchangers including radiators, heaters, condensers + evaporators. Some units are assembled into HVAC units which contain a plastic case which is injection molded onsite.

2 List the Standard Industrial Classification (SIC) codes or North American Industrial Classification System (NAICS) codes that you use to classify business at your facility.

SIC

3714

NAICS

3 Does your company meet the Small Business Administration definition of a small business for your sector?

☐ Yes

☒ No

4 How many employees (full-time equivalents) currently work at your facility?

☐ Fewer than 50

☐ 50-99

☐ 100-499

☐ 500-1,000

☒ More than 1,000

Section A, continued

- 5 Does your facility have an EPA ID number(s) ?

☒ Yes ☐ No

If yes, list in the right-hand column.

MID 038624508

- 6 Identify the environmental requirements that apply to your facility. Use the Environmental Requirements Checklist, at the back of the instructions, as a reference. List your requirements to the right or enclose a completed Checklist with your application.

See Attached Checklist

- 7 Check the appropriate box in the right-hand column.

☐ I've listed the requirements above.

☒ I've enclosed the Checklist with my application.

- 8 Optional: Is there anything else you would like to tell us about your facility?

The facility has been ISO 14000 third party registered since June 1998. In December 1998, the facility was designated a Michigan Clean Corporate Citizen (CC) by the MDEQ.

Why do we need this information?

Facilities need to have an operating Environmental Management System (EMS) that meets certain requirements.

What do you need to do?

- Confirm that your EMS meets the Achievement Track requirements.
- Tell us if you have completed a self-assessment or have had a third-party assessment of your EMS.

Section B

Tell us about your EMS.

- 1 Check **yes** if your EMS meets the requirements for each element below as defined in the instructions.

a. Environmental policy ☒ Yes

b. Planning ☒ Yes

c. Implementation and operation ☒ Yes

d. Checking and corrective action ☒ Yes

e. Management review ☒ Yes

- 2 Have you completed at least one EMS cycle (plan-do-check-act)? ☒ Yes

- 3 Did this cycle include both an EMS and a compliance audit? ☒ Yes

- 4 Have you completed an objective self-assessment or third-party assessment of your EMS? ☒ Yes

If yes, what method of EMS assessment did you use?

☒ Self-assessment

☐ GEMI

☐ Other

☐ CEMP

☒ Third-party assessment

☒ ISO 14001 Certification

☐ Other

Section C

Tell us about your past achievements and future commitments.

Why do we need this information?

Facilities must show that they are committed to improving their environmental performance. This means that you can describe past achievements and will make future commitments.

What do you need to do?

Refer to the Environmental Performance Table in the instructions to answer questions 1 and 2.

- 1 Describe your past achievements for at least two environmental aspects. If you need more space than is provided, attach copies of this page.

Note to small facilities: If you qualify as a small facility as defined in the instructions, you are required to report past achievement for at least one environmental aspect.

First aspect you've selected

What aspect have you selected?	What was the previous level (2 years ago)?		What is the current level?	
	Quantity	Units	Quantity	Units
Emission of VOC'S	22.59	tons / yr	6.04	tons / yr
i. How is the current level an improvement over the previous level?				
<u>Total VOC emissions have decreased 83%, while</u> <u>Production volume has increased.</u>				
ii. How did you achieve this improvement?				
<u>A reduction of 17 tons was made by changing the</u> <u>design of radiators, for some customers, to aluminum</u> <u>material which doesn't require paint.</u>				

Section C, continued

Second aspect you've selected

What aspect have you selected?	What was the previous level (2 years ago)?		What is the current level?	
	Quantity	Units	Quantity	Units
Hazardous Solid Waste	240	tons/yr	152	tons/yr
<p>i. How is the current level an improvement over the previous level?</p> <p>The current level is an 37% decrease, while Production has increased.</p>				
<p>ii. How did you achieve this improvement?</p> <p>The reduction came from a reduction in waste water treatment plant sludge. A decrease in metals in waste water, and decrease in overall water, resulted in the current level.</p>				

- 2 Select at least four environmental aspects (no more than two from any one category) from the Environmental Performance Table in the instructions and then tell us about your future commitments. If you need more space than is provided, attach copies of this section.

Note to small facilities: If you are a small facility, you are required to make commitments for at least two environmental aspects in two different categories.

First aspect you've selected

a. What is the aspect?

Emission of VOC's

b. Is this aspect identified as significant in your EMS?

☒ Yes ☐ No

c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.

☐ Option A:
Absolute value

6.04 tons/yr
(Quantity/Units)

☐ Option B:
In terms of
units of production
or output

(Quantity/Units)

Section C, continued

d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.

☐ Option A:
Absolute value

4.0 tons/yr in 2003
(Quantity/Units)

☐ Option B:
In terms of units
of production
or output

(Quantity/Units)

e. How will you achieve this improvement?

Further reduction of painted
radiators, design change to
aluminum. Elimination of
bracket painting machine.

Second aspect you've selected

a. What is the aspect?

Total Water Treated

b. Is this aspect identified as significant in your EMS?

☒ Yes ☐ No

c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.

☒ Option A:
Absolute value

80 million gallons/yr
(Quantity/Units)

☐ Option B:
In terms of units
of production
or output

(Quantity/Units)

d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute level or in terms of units of production or output.

☒ Option A:
Absolute value

70 million gallons/yr
(Quantity/Units) in 2003

☐ Option B:
In terms of units
of production
or output

(Quantity/Units)

e. How will you achieve this improvement?

Removal of 1 Aqueous
Degreaser Machine.

Section C, continued

Third aspect you've selected

- What is the aspect?
- Is this aspect identified as significant in your EMS?
- What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.
- What is the improvement you are committing to over the next three years? You may choose to state this as an absolute level or in terms of units of production or output.
- How will you achieve this improvement?

Discharge of Toxics to Water (copper)

☒ Yes ☐ No

☒ Option A:
Absolute value

200 pounds/year
(Quantity/Units)

☐ Option B:
In terms of units
of production
or output

(Quantity/Units)

☒ Option A:
Absolute value

100 pounds/year
(Quantity/Units) in 2003

☐ Option B:
In terms of units
of production
or output

(Quantity/Units)

Reduction of Copper/Brass
Radiator production as a
part of design change to
Aluminum radiators.

Fourth aspect you've selected

- What is the aspect?
- Is this aspect identified as significant in your EMS?
- What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.
- What is the improvement you are committing to over the next three years? You may choose to state this as an absolute level or in terms of units of production or output.
- How will you achieve this improvement?

Recycled Materials/Waste

☐ Yes ☒ No

☒ Option A:
Absolute value

485,000 pounds lead solder/yr
(Quantity/Units)

☐ Option B:
In terms of units
of production
or output

(Quantity/Units)

☒ Option A:
Absolute value

210,000 pounds lead solder/yr
(Quantity/Units)

☐ Option B:
In terms of units
of production
or output

(Quantity/Units)

Reduction of Copper/Brass
Radiator production as a
part of design change to
Aluminum Radiators.

Section D

Tell us about your public outreach and reporting.

Why do we need this information?

Facilities need to demonstrate their commitment to public outreach and performance reporting. You should have appropriate mechanisms in place to identify community concerns, to communicate with the public, and to provide information on your environmental performance.

What do you need to do?

- Describe your approach to public outreach.
- List three references who are familiar with your facility.

1 How do you identify and respond to community concerns?

DENSO'S ISO14000 EHS contains a procedure to review + respond to all inquiries + document actions. DENSO proactively informs public of our environmental efforts through news releases.

2 How do you inform community members of important matters that affect them?

DENSO strives to keep our associates educated and informed. News releases are used to communicate also.

3 How will you make the Achievement Track Annual Performance Report available to the public?

☐ Website www.

☒ Newspaper

☐ Open Houses

☒ Other

Available upon request

Section D, continued

4 Are there any ongoing citizen suits against your facility?

☐ Yes

☒ No

If yes, describe briefly in the right-hand column.

5 List references below.

	Organization	Name	Phone number
Representative of a Community/ Citizen Group	Battle Creek Unlimited	Jan A. Burkard	616-962-7526 x22
State/Local regulator	MDEQ MDEQ MDEQ	Kelly Claudell Valerie Haan Steve Holmi	517-241-7969 517-241-0231 517-373-1323
Other community/local reference			

Fax Message**DENSO**

DENSO MANUFACTURING MICHIGAN, INC.

One Denso Road
Battle Creek, Michigan 49015-1083Main Office Fax 1: (616)965-8399
Main Office Fax 2: (616)962-0018
Telephone: (616) 965-3322

To: Emily Levin
Date: October 30, 2000
Subject: National Environmental Achievement Track
cc:

Need Reply: No

Fax No. 617-354-0463
Approved by
Check
Written by Kathy O'Shei
Department Engineering

As per our conversation on October 26, 2000, DENSO Manufacturing Michigan's additional Community / Local Reference for the National Environmental Achievement Track Application is:

Ted Dearing, President of Battle Creek Chamber of Commerce
Phone: 616-962-4076
(former Mayor of Battle Creek)

Facility Official Signature:

Name Takeshi Iguchi Title V.P. of Eng. Date 10-30-2000
< Takeshi Iguchi >

If you have any questions, please contact me at 616-965-3322, extension 3850.

Sincerely,
Kathleen O'Shei
Project Supervisor, Environmental/Chemical

Section E

Application and Participation Statement

On behalf of DENSO Manufacturing Michigan, Inc
[my facility],

I certify that

- I have read and agree to the terms and conditions, as specified in the National Environmental Achievement Track Description;
- I have personally examined and am familiar with the information contained in this Application (including, if attached, the Environmental Requirements Checklist). The information contained in this Application is, to the best of my knowledge and based on reasonable inquiry, true, accurate, and complete, and I have no reason to believe the facility would not meet all program requirements;
- My facility has an environmental management system (EMS), as defined in the Achievement Track EMS requirements, including systems to maintain compliance with all applicable federal, state, and local environmental requirements, in place at the facility, and the EMS will be maintained for the duration of the facility's participation in the program;
- My facility has conducted an objective assessment of its compliance with all applicable federal, state, and local environmental requirements, and the facility has corrected all identified instances of potential or actual noncompliance;
- Based on the foregoing compliance assessment and subsequent corrective actions (if any were necessary), my facility is, to the best of my knowledge and based on reasonable inquiry, currently in compliance with applicable federal, state, and local environmental requirements;

I agree that EPA's decision whether to accept participants into or remove them from the National Environmental Achievement Track is wholly discretionary, and I waive any right that may exist under any law to challenge EPA's acceptance or removal decision.

I am the senior facility manager and fully authorized to execute this statement on behalf of the corporation or other legal entity whose facility is applying to this program.

Signature/Date Takeshi (Ken) Iguchi 9/26/00

Printed Name/Title TAKESHI (Ken) Iguchi, Vice-President, Engineering

Facility Name DENSO Manufacturing Michigan, Inc

Facility Street Address 1 DENSO Road, Battle Creek, MI 49015

Facility ID Numbers MID038624508

The National Environmental Performance Track is a U.S. Environmental Protection Agency program. Please direct inquiries to 1-888-339-PTRK or e-mail ptrack@indecon.com. Mail completed applications to:

The Performance Track Information Center
c/o Industrial Economics Incorporated
2067 Massachusetts Avenue
Cambridge, MA 02140

National Environmental Achievement Track

Environmental Requirements Checklist

The following *Checklist* is provided to assist facilities in answering *Section A, Tell us about your facility,* " *Question 6.* The *Checklist* is given to help facilities identify the major federal, state, tribal, and local environmental requirements applicable at their facilities. The *Checklist* is not intended to be an exhaustive list of all environmental requirements that may be applicable at an individual facility.

If you use this *Checklist* and choose to submit it with your application, fill in your facility information below and enclose the completed *Checklist* with your application (see instructions).

Facility Name: DENSO Manufacturing Michigan, Inc.

Facility Location: 1 Denso Road, Battle Creek, MI 49015

Facility ID Number(s): MI0038624508, State Air Number N192
(attach additional sheets if necessary)

Air Pollution Regulations

Check All
That Apply

1. National Emission Standards for Hazardous Air Pollutants (40 CFR 61)
2. Permits and Registration of Air Pollution Sources
3. General Emission Standards, Prohibitions and Restrictions
4. Control of Incinerators
5. Process Industry Emission Standards
6. Control of Fuel Burning Equipment
7. Control of VOCs
8. Sampling, Testing and Reporting
9. Visible Emissions Standards
10. Control of Fugitive Dust
11. Toxic Air Pollutants Control
12. Vehicle Emissions Inspections and Testing

~~X~~
~~X~~
~~X~~
~~X~~
~~X~~
~~X~~
~~X~~
~~X~~
~~X~~
~~X~~
~~X~~
~~X~~

Other Federal, State, Tribal or Local Air Pollution Regulations Not Listed Above
(identify)

13. _____ **G**

14. _____ **G**

Hazardous Waste Management Regulations

- | | | | |
|----|---|----------|--------------|
| 1. | Identification and Listing of Hazardous Waste (40 CFR 261) | | G |
| | - Characteristic Waste | | G |
| | - Listed Waste | | G |
| 2. | Standards Applicable to Generators of Hazardous Waste (40 CFR 262) | | G |
| | - Manifesting | | G |
| | - Pre-transport requirements | | G |
| | - Record keeping/reporting | | G |
| 3. | Standards Applicable to Transporters of Hazardous Waste (40 CFR 263) | | G |
| | - Transfer facility requirements | | G |
| | - Manifest system and record-keeping | | G |
| | - Hazardous waste discharges | | G |
| 4. | Standards for Owners and Operators of TSD Facilities (40 CFR 264) | | G |
| | - General facility standards | | G |
| | - Preparedness and prevention | | G |
| | - Contingency plan and emergency procedures | | G |
| | - Manifest system, Record keeping and reporting | G | G |
| | - Groundwater protection | | G |
| | - Financial requirements | G | G |
| | - Use and management of containers | | G |
| | - Tanks | | G |
| | - Waste piles | | G |
| | - Land treatment | | G |
| | - Incinerators | | G |
| 5. | Interim Status Standards for TSD Owners and Operators (40 CFR 265) | | G |
| 6. | Interim Standards for Owners and Operators of New Hazardous Waste Land Disposal Facilities (40 CFR 267) | | G |
| 7. | Administered Permit Program (Part B) (40 CFR 270) | | G |

Other Federal, State, Tribal or Local Hazardous Waste Management Regulations Not Listed Above (*identify*)

- | | | |
|----|-------|----------|
| 8. | _____ | G |
| 9. | _____ | G |

Hazardous Materials Management

- | | | |
|----|---|--------------|
| 1. | Control of Pollution by Oil and Hazardous Substances (33 CFR 153) | G |
| 2. | Designation of Reportable Quantities and Notification of Hazardous Materials Spill (40 CFR 302) | G |
| 3. | Hazardous Materials Transportation Regulations (49 CFR 172-173) | G |
| 4. | Worker Right-to-Know Regulations (29 CFR 1910.1200) | G |
| 5. | Community Right-to-Know Regulations (40 CFR 350-372) | G |

Other Federal, State, Tribal or Local Hazardous Materials Management Regulations Not Listed Above (*identify*)

- | | | |
|----|-------|----------|
| 6. | _____ | G |
| 7. | _____ | G |

Solid Waste Management

- | | | |
|----|---|----------|
| 1. | Criteria for Classification of Solid Waste Disposal Facilities and Practices (40 CFR 257) | G |
| 2. | Permit Requirements for Solid Waste Disposal Facilities | G |
| 3. | Installation of Systems of Refuse Disposal | G |
| 4. | Solid Waste Storage and Removal Requirements | G |
| 5. | Disposal Requirements for Special Wastes | G |

Other Federal, State, Tribal or Local Solid Waste Management Regulations Not Listed Above (*identify*)

- | | | |
|----|-------|----------|
| 6. | _____ | G |
| 7. | _____ | G |

Water Pollution Control Requirements

- | | | |
|----|---|--------------|
| 1. | Oil Spill Prevention Control and Countermeasures (SPCC) (40 CFR 112) | G |
| 2. | Designation of Hazardous Substances (40 CFR 116) | G |
| 3. | Determination of Reportable Quantities for Hazardous Substances (40 CFR 117) | G |
| 4. | NPDES Permit Requirements (40 CFR 122) | G |
| 5. | Toxic Pollutant Effluent Standards (40 CFR 129) | G |
| 6. | General Pretreatment Regulations for Existing and New Sources (40 CFR 403) | G |
| 7. | Organic Chemicals Manufacturing Point Source Effluent Guidelines and Standards (40 CFR 414) | G |

- | | | |
|-----|---|--------------|
| 8. | Inorganic Chemicals Manufacturing Point Source Effluent Guidelines and Standards (40 CFR 415) | G |
| 9. | Plastics and Synthetics Point Source Effluent Guidelines and Standards (40 CFR 416) | G |
| 10. | Water Quality Standards | G |
| 11. | Effluent Limitations for Direct Dischargers | G |
| 12. | Permit Monitoring/Reporting Requirements | G |
| 13. | Classifications and Certifications of Operators and Superintendents of Industrial Wastewater Plants | G |
| 14. | Collection, Handling, Processing of Sewage Sludge | G |
| 15. | Oil Discharge Containment, Control and Cleanup | G |
| 16. | Standards Applicable to Indirect Discharges (Pretreatment) | G |

Other Federal, State, Tribal or Local Water Pollution Control Regulations Not Listed Above (*identify*)

- | | | |
|-----|-------|---|
| 17. | _____ | G |
| 18. | _____ | G |

Drinking Water Regulations

- | | | |
|----|---|---|
| 1. | Underground Injection and Control Regulations, Criteria and Standards (40 CFR 144, 146) | G |
| 2. | National Primary Drinking Water Standards (40 CFR 141) | G |
| 3. | Community Water Systems, Monitoring and Reporting Requirements (40 CFR 141) | G |
| 4. | Permit Requirements for Appropriation/Use of Water from Surface or Subsurface Sources | G |
| 5. | Underground Injection Control Requirements | G |
| 6. | Monitoring, Reporting and Record keeping Requirements for Community Water Systems | G |

Other Federal, State, Tribal or Local Drinking Water Regulations Not Listed Above (*identify*)

- | | | |
|----|-------|---|
| 7. | _____ | G |
| 8. | _____ | G |

Toxic Substances

- | | |
|----|---|
| 1. | Manufacture and Import of Chemicals, Record keeping and Reporting |
|----|---|

- | | | |
|----|--|--------------|
| | Requirements (40 CFR 704) | G |
| 2. | Import and Export of Chemicals (40 CFR 707) | G |
| 3. | Chemical Substances Inventory Reporting Requirements (40 CFR 710) | G |
| 4. | Chemical Information Rules (40 CFR 712) | G |
| 5. | Health and Safety Data Reporting (40 CFR 716) | G |
| 6. | Pre-Manufacture Notifications (40 CFR 720) | G |
| 7. | PCB Distribution Use, Storage and Disposal (40 CFR 761) | G |
| 8. | Regulations on Use of Fully Halogenated Chlorofluoroalkanes (40 CFR 762) | G |
| 9. | Storage and Disposal of Waste Material Containing TCDD (40 CFR 775) | G |

Other Federal, State, Tribal or Local Toxic Substances Regulations Not Listed Above
(*identify*)

- | | | |
|-----|-------|---|
| 10. | _____ | G |
| 11. | _____ | G |

Pesticide Regulations

- | | | |
|----|--|---|
| 1. | FIFRA Pesticide Use Classification (40 CFR 162) | G |
| 2. | Procedures for Disposal and Storage of Pesticides and Containers
(40 CFR 165) | G |
| 3. | Certification of Pesticide Applications (40 CFR 171) | G |
| 4. | Pesticide Licensing Requirements | G |
| 5. | Labeling of Pesticides | G |
| 6. | Pesticide Sales, Permits, Records, Application and Disposal Requirements | G |
| 7. | Disposal of Pesticide Containers | G |
| 8. | Restricted Use and Prohibited Pesticides | G |

Other Federal, State, Tribal or Local Pesticides Regulations Not Listed Above (*identify*)

- | | | |
|-----|-------|---|
| 9. | _____ | G |
| 10. | _____ | G |

Environmental Clean-Up, Restoration, Corrective Action

- | | | |
|----|---|---|
| 1. | Comprehensive Environmental Response, Compensation and Liability
Act (Superfund) (<i>identify</i>) | |
| | _____ | G |
| | _____ | G |

2. RCRA Corrective Action (*identify*)

_____ **G**

_____ **G**

**Other Federal, State, Tribal or Local Environmental Clean-Up, Restoration, Corrective
Action Regulations Not Listed Above (*identify*)**

3. _____ **G**

4. _____ **G**